

Forever Teaching

Modern Slavery and Human Trafficking Policy

Date policy issued: 08/08/2026

Date policy last reviewed: 08/08/2026

This policy will be reviewed every 12 months (as a minimum).

Review due date: 08/08/2027

Designated Safeguarding Lead contact details:

Designated Safeguarding Lead: Ethan Taberner & Joshua Heaton

Designated Safeguarding Lead Contact details: ethan.taberner@foreverteaching.co.uk / joshua.heaton@foreverteaching.co.uk / 0161 327 4385

1. Purpose

Forever Teaching Ltd is committed to preventing slavery, servitude, forced or compulsory labour, human trafficking and labour exploitation in its own operations and supply chain. This policy sets out the controls used by the company as an education recruitment and temporary staffing agency.

Scope note: Forever Teaching is not currently understood to meet the statutory turnover threshold requiring an annual statement under section 54 of the Modern Slavery Act 2015. The company nevertheless adopts this policy voluntarily and will review its reporting obligations as it grows.

2. Scope

This policy applies to directors, employees, temporary workers, candidates, contractors, suppliers, payroll or umbrella providers, and any other organisation involved in delivering services for or on behalf of Forever Teaching.

3. Policy commitments

- Zero tolerance of modern slavery, human trafficking, forced labour, debt bondage, child labour and exploitation.
- No recruitment fees will be charged to candidates or temporary workers for finding work.

- Workers will receive clear information about assignments, pay, deductions, employment status and the identity of any employing or payroll entity.
 - Identity and right-to-work checks will be completed before work starts, using lawful and non-discriminatory processes.
 - Workers will retain control of their own passports, identity documents, bank accounts and personal property.
 - Concerns will be handled sensitively, promptly and without retaliation against a person who raises them in good faith.
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4. Risk assessment and due diligence

Forever Teaching takes a proportionate, risk-based approach. Higher-risk arrangements include complex labour supply chains, unusual payment instructions, unexplained deductions, workers being controlled by third parties, use of unapproved umbrella companies, and suppliers operating in higher-risk sectors or jurisdictions.

- Check the legal identity, ownership and trading status of material suppliers.
 - Review relevant insurance, data-protection, employment, tax and right-to-work arrangements.
 - Assess payroll and umbrella providers for transparency of pay, deductions, holiday pay and worker communications.
 - Require contractual compliance with applicable law and cooperation with audits or information requests.
 - Review concerns, adverse media, regulatory action or material changes before continuing the relationship.
 - Suspend or terminate a relationship where serious concerns cannot be satisfactorily resolved.
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5. Recruitment and worker safeguards

- Candidates are interviewed and their identity, work history and right to work are checked before placement.
- Bank-detail changes and unusual requests are verified to reduce coercion and fraud risks.
- Workers can raise concerns directly with a director, including where they believe another person controls their pay, documents, transport or accommodation.
- Candidate information is treated confidentially and shared only where lawful and necessary.
- Forever Teaching will not knowingly work with any person or supplier that uses threats, deception, coercion or unlawful deductions.

6. Warning signs

- A worker appears fearful, coached, unable to speak privately or dependent on another person to answer questions.
- A third party controls the worker's identity documents, phone, bank account, wages or movements.
- Addresses, bank details or contact details are shared by multiple unrelated workers without a reasonable explanation.
- Pay is diverted, unexplained deductions are made, or the worker reports debt linked to recruitment or travel.
- The worker appears unable to leave employment or accommodation freely.
- A supplier refuses reasonable due-diligence questions or provides inconsistent information.

7. Reporting and response

Concerns should be reported immediately to Joshua Heaton or Ethan Taberner. Where there is an immediate danger, call 999. The company will record the concern, protect confidentiality as far as reasonably possible, consider safeguarding and police referrals, preserve relevant evidence and avoid actions that could place a potential victim at greater risk.

No person will suffer dismissal, disadvantage or retaliation for raising a genuine concern in good faith. Deliberately malicious allegations may be addressed under the appropriate conduct procedure.

8. Training, monitoring and review

Relevant employees will receive proportionate guidance on warning signs, ethical recruitment, escalation and supplier due diligence. The directors will review material suppliers, incidents and lessons learned, and will update this policy at least annually or after a material legal, operational or supply-chain change.

9. Records

Due-diligence records, concerns, investigations and actions will be retained securely in accordance with the company's Data Retention Policy and applicable legal requirements.

Approval

This policy is approved on behalf of Forever Teaching Ltd and takes effect from the date of approval.

Policy Owner: Directors

Approved By: Directors of Forever Teaching

Version: 1.0

Review Date: Annually